



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: EPR-N

David Beckhouse
Federal Transit Administration
c/o Gold Line Team
GBSM
600 17th Street, Suite 2020
Denver, CO 80202

Re: Gold Line Corridor Draft EIS
CEQ# 20080276

Dear Mr. Beckhouse:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Draft Environmental Impact Statement (DEIS) for the Gold Line project. Our comments are provided in accordance with our authorities pursuant to the National Environmental Policy Act (NEPA), 42 U.S.C. 4231, Section 309 of the Clean Air Act, and Section 404 of the Clean Water Act.

The proposed project is to provide commuter rail from Denver Union Station (DUS) in downtown Denver to Ward Road in Wheat Ridge, Colorado. From DUS to Pecos Street, the alignment is shared with the Northwest Rail project. Including the 3.5 mile shared section from DUS to Pecos Street, the total proposed alignment would be 11.2 miles long and include seven stations. West of Pecos Street to Ward Road, the alignment will be within the existing BNSF Railway Company and Union Pacific Railroad Company (BNSF/UP) freight railroad right-of-way (ROW). The Federal Transit Administration, local governments, regulatory agencies and the public concurred with the selection of the Preferred Alternative in the summer of 2007. The Gold Line study area is in the Denver metropolitan area and encompasses the northwestern portion of the City and County of Denver, and parts of Adams County, Jefferson County, the City of Arvada and the City of Wheat Ridge.

The DEIS considers three alternatives including the No Action Alternative, the Transportation System Management (TSM) Alternative and the Preferred Alternative. The No Action Alternative includes existing projects and financially committed projects within the study area to respond to the expected growth in the study area to the year 2030. The TSM alternative represents the "best that can be done" without implementing a major capital investment. This alternative is also described as the "best bus alternative." The Preferred Alternative provides faster, safer and more reliable travel time over single occupancy vehicles and/or buses in the

other alternatives (Tables 5-1 and 5-2, DEIS page 5-2). In expanding service to traditional and new transit users, the Gold Line will result in reduced vehicle miles traveled, and corresponding reductions in greenhouse gases. Despite the projected growth in the project area, air quality, as measured in CO, NO_x, VOC and PM₁₀, is expected to modestly improve under the proposed action (Table 5-3, DEIS page 5-4).

Overall, EPA finds the DEIS provides a thorough description of the alternatives evaluation process, the proposed alternatives and the environmental impacts of the project. The document is well-organized, with excellent graphics and schematics, and easy to read. The Gold Line EIS team has combined land use and transportation planning, with an emphasis on environmental resources, in developing its Preferred Alternative. While much depends on how negotiations with the railroad companies proceed, the Preferred Alternative will minimize environmental impacts by sharing portions of the railroad right-of-way. By utilizing an existing corridor, the Gold Line will have limited impacts to wildlife habitat, ecosystems, wetlands and source waters.

Although the proposed Gold Line will encourage new development around the transit stations, it will primarily be compact urban development. Infill development and redevelopment will contribute to reducing urban sprawl in the outskirts of the Gold Line study area and offer redevelopment opportunities for older suburbs. Communities that accommodate more infill and redevelopment can greatly reduce the environmental impacts of development. Infill can reduce overall impervious surface in a watershed, reduce trip times and distances to lower emissions and energy use, help protect human health and attract private capital to upgrade infrastructure and/or clean up contamination.

EPA's primary concern is with impacts to surface water quality from increased impervious surfaces for parking facilities. In the project area, the South Platte River, Clear Creek and Ralston Creek are all impaired for E. coli, and Clear Creek is also impaired for aquatic life use and organic sediment. The Preferred Alternative will add 55-58 acres of new impervious surface, which will increase contaminated runoff loadings to those impaired waters. The DEIS should better address the impacts from increased flooding and erosion due to new impervious surfaces associated with residential, business, and transportation development on those water bodies.

As a cooperating agency over the past two years, EPA has attended numerous Agency Working Group meetings and public meetings. EPA notes that the extensive inter-agency and public process, where alternatives were changed or added based on agency and public concerns with community and/or environmental impacts, has resulted in high community support for the Preferred Alternative. Federal, State, local community leaders, and the public provided comments and input at five milestone meetings for each step of the alternatives screening process. EPA commends the Gold Line EIS Team for involving affected local governments, agencies and the public in a thorough, collaborative planning and decision making process.

Based on EPA's procedures for evaluating potential environmental impacts of proposed actions and the adequacy of the information presented, EPA is rating the Preferred Alternative as

EC-1. The “EC” rating means that our review has identified potential environmental impacts to impaired water bodies that should be further addressed in the FEIS. The “1” portion of this rating means that the DEIS contains sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment. A summary of EPA’s rating system is enclosed.

If you have any questions or would like to discuss our comments, please contact me at 303 312-6004 or the lead reviewer of this project, Jody Ostendorf, at 303 312-7814.

Sincerely,

/s/ Deborah Lebow-Aal
for Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosure

